

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**In Re: JOHNNIE SANFORD and
SHIRE SANFORD**

**CHAPTER 13
NO: 13-12628 JDW**

RESPONSE TO OBJECTION TO CONFIRMATION

COMES NOW, JOHNNIE SANFORD and SHIRE SANFORD, Debtors in the above styled and numbered cause, by and through undersigned counsel, and file this their Response to Objection to Confirmation, said Objection having been filed by Treasurer Loans of Batesville, Inc. (“Treasurer”) (Dk #69), respectfully showing unto the Court as follows:

1. The allegations of paragraph one of the Objection are admitted.
2. The allegations of paragraph two of the Objection are admitted.
3. The allegations of paragraph three of the Objection are admitted.
4. The allegations of paragraph four of the Objection are admitted.
5. With respect to the allegations of paragraph five, the Debtors assert that since the loan is an oversecured claim, the Debtors are entitled to pay a *Till* rate which has a risk factor of 1.25% above the Wall Street Journal Prime Rate of 3.25%.
6. The allegations of paragraph six of the Objection are denied.
7. The allegations of paragraph seven of the Objection are denied. The Debtors have proposed to pay the full amount of the claims with a proper *Till* rate.
8. The allegations of paragraph eight of the Objection are denied.
9. With respect to the allegations of paragraph nine of the Objection, the Debtors assert that there are no allegations to admit or deny.

10. With respect to the allegation of paragraph ten of the Objection, Treasurer is only entitled to offer proof to establish allegations set forth in its Objection.

WHEREFORE, Debtors pray this Court will enter its Order overruling the Objection to Confirmation filed by Treasurer and dismissing the same. Debtors pray for such other, further and general relief to which they may be entitled.

Respectfully Submitted,
JOHNNIE SANFORD and
SHIRE SANFORD, Debtors

By: /s/ Robert Gambrell
Robert Gambrell (MSB #4409), Atty for
Debtors

CERTIFICATE OF SERVICE

I, ROBERT GAMBRELL, Attorney for the above listed Debtors, do hereby certify that the following have been served electronically via ECF the above Response to Objection to Confirmation:

Henry G. Hobbs, Jr., Acting U. S. Trustee: USTPRegion05.JA.ECF@usdoj.gov
Locke D. Barkley: sbeasley@barkley13.com
B. Joey Hood, II: notices@jhloodlaw.com, cynthiah@jhloodlaw.com

Served on this the 30th day of August, 2013.

/s/ Robert Gambrell
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